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1 2 3 4 5 6 7	Kathryn Lee Boyd (SBN 189496) LBoyd@hechtpartners.com Maxim Price (pro hac vice pending) MPrice@hechtpartners.com David L. Hecht (pro hac vice pending) DHecht@hechtpartners.com Alan Alvela (pro hac vice pending) AAlvela@hechtpartners.com HECHT PARTNERS LLP 125 Park Avenue, 25th Floor New York, New York 10017 Telephone: (212) 851-6821 Facsimile: (646) 492-5111	
8 9	Attorneys for Intervenor Claimant Lucas E. Buckley as Trustee of the Gox Victim Bitcoin Trust	
<ul><li>10</li><li>11</li><li>12</li></ul>	THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION	
13	UNITED STATES OF AMERICA,	Case No. 20-7811 RS
14 15	Plaintiff, v.	HON. RICHARD SEEBORG United States District Judge Courtroom 3
16 17 18 19 20	Approximately 69,370 Bitcoin (BTC), Bitcoin Gold (BTG), Bitcoin SV (BSV), and Bitcoin Cash (BCH) seized from 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx,  Defendant,	STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSIVE PLEADING TO THE FIRST AMENDED COMPLAINT FOR FORFEITURE
21 22 23	Lucas E. Buckley, as Trustee of the Gox Victim Bitcoin Trust,  Claimant.	Case Filed: November 5, 2020 FAC Filed: November 20, 2020 Trial Date: TBD
<ul><li>24</li><li>25</li><li>26</li></ul>		
27	I	

STIPULATION AND [PROPOSED] ORDER

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COMES NOW Claimant Lucas E. Buckley, Esq., as Trustee of the Gox Victim Bitcoin 1 Trust, by and through counsel, to apply for 21-day extension of time to file an answer. 2 WHEREAS, on November 20, 2020, the united states filed an amended forfeiture compliant, notice of which was published on November 27, 2020. WHEREAS, on January 25, 2021, Claimant Buckley, as trustee of the Gox Victim Bitcoin Trust, filed a verified claim and statement of interest. WHEREAS, Claimant's answer is presently due on February 16, 2020. WHEREAS, the complexity of this case and the complications caused by the ongoing pandemic has necessitated Claimant Buckley to request this extension of time. WHEREAS, this is the first extension requested by Claimant. 10 WHEREAS, extensions of time to submit a responsive pleading have also been requested 11 12 by claimants Roman Hossain and Ulbricht. WHEREAS, this extension is sought in the interest of justice and not for delay, and no 13 party will be prejudiced if the extension is granted. 14 WHEREAS, no party opposes this request. 15 WHEREAS, the Plaintiff, the United States, consents to this request but does not concede 16 the validity of the form or substance of claimant's claim and reserves all rights to challenge said 17 claim on any and all available grounds. 18 19 NOW, THEREFORE, IT IS HEREBY REQUESTED that Claimant Buckley be granted a 21-day extension to file an answer. 20 21 Dated: February 16, 2021 22 HECHT PARTNERS LLP 23 By: /s/ Kathryn Lee Boyd 24 Maxim Price (pro hac vice pending) 25 Kathryn Lee Boyd (SBN 189496) David L. Hecht (pro hac vice pending) 26 Alan Alvela (pro hac vice pending) 27 Attorneys for Intervenor Claimant 28 STIPULATION AND [PROPOSED] ORDER

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1	Lucas E. Buckley as Trustee of the Gox Victim Bitcoin Trust	
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4	Dated: February 16, 2021	
5	UNITED STATES ATTORNEY'S OFFICE	
6		
7	By: <u>/s/David Countryman</u> David Countryman	
8	Criminal Division, Asset Forfeiture	
	450 Golden Gate Ave.,11th Floor	
9	San Francisco, CA 94102 david.countryman@usdoj.gov	
10	415-436-7303	
11	Attorneys for United States of America	
12		
13	<b>ATTESTATION:</b> Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing	
14	ATTESTATION. Tursuant to Local Rule 3-1(1)(3), Thereby affect that concurrence in the fining	
15	of this document has been obtained from David Countryman.	
16		
17	By: <u>/s/ Kathryn Lee Boyd</u> Counsel for Claimant Lucas E. Buckley	
18	Counsel for Claimant Eucas E. Buckley	
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	STIPULATION AND [PROPOSED] ORDER	

Case No. 20-7811 RS

**ORDER** It is hereby ORDERED and ADJUDGED that Claimant be given a 21-day extension to file an answer. SO ORDERED. Dated: 2/17/2021 Chief United States District Judge